

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

In re POLYURETHANE FOAM ANTITRUST
LITIGATION

MDL Docket No. 2196
Index No. 10-MD-2196 (JZ)

This document relates to:

Factory Direct, Inc. v. The Carpenter Co., et al.,
Case No. 1:11-pf-10011-JZ

**STIPULATION AND MOTION TO SUSPEND LITIGATION AGAINST DOMFOAM
INTERNATIONAL, INC. AND VALLE FOAM INDUSTRIES (1995) INC.**

Whereas, Plaintiff Factory Direct, Inc. ("Plaintiff") and Domfoam International, Inc. ("Domfoam") and Valle Foam Industries (1995) Inc. ("Valle") have entered into a Settlement Agreement as of January 3, 2012 (the "Agreement"); and

Pursuant to the terms of the Agreement, the parties hereby submit to this Court a joint request for an order suspending the litigation proceedings against Domfoam and Valle only; and

Pursuant to the terms of the Agreement, and subject to approval of this Court, the parties stipulate and request that this Court enter an Order suspending all proceedings as scheduled against Domfoam and Valle only.

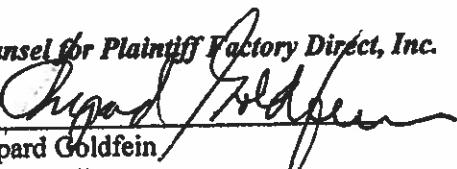
Wherefore, the parties respectfully request the Court to enter an Order suspending all proceedings as scheduled against Domfoam and Valle only pursuant to the terms of this stipulation and motion.

Dated: January 10, 2012

By: 

David A. Elder
delder@hartzoglaw.com
HARTZOG CONGER CASON & NEVILLE
1600 Bank of Oklahoma Plaza
201 Robert S. Kerr Avenue
Oklahoma City, OK 73102
Tel: (405) 235-7000
Fax: (405) 996-3403

Counsel for Plaintiff Factory Direct, Inc.

By: 

Shepard Goldfein
Elliot A. Silver
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Four Times Square
New York, NY 10036
Tel: (212) 735-3610
Fax: (917) 777-3610

*Counsel for Domsoam International, Inc., and
Valle Foam Industries (1995) Inc.*

IT IS SO ORDERED.

Dated: January __, 2012

JACK ZOUHARY
U.S. DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2012, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipts. Parties may access this filing through the Court's system.

/s/ Elliot A. Silver
Elliot A. Silver
Skadden, Arps, Slate,
Meagher & Flom LLP
Four Times Square
New York, NY 10036
Phone: (212) 735-3000
Fax: (212) 735-2000
E-mail: elliot.silver@skadden.com